

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF IOWA

IN RE

**MERCY HOSPITAL, IOWA CITY,
IOWA *et al***
Debtors

Chapter 11

Case No. 23-00623

**LIMITED & PROTECTIVE
OBJECTION TO CHAPTER 11 PLAN**

COMES NOW Progressive Rehabilitation Associates, LLC (“PRA”), through its undersigned counsel, and for its objection as above titled, respectfully states:

1. PRA has pending with this Court its Motion for Payment of Ordinary Course Invoices (docket #990) that is set for phone hearing on May 31, 2024.
2. To the extent, if any, that Debtor’s Chapter 11 Plan affects or attempts to avoid the relief requested in that Motion, PRA objects to the Plan.

WHEREFORE, Progressive Rehabilitation Associates, LLC respectfully requests that this Court, as needed to protect the interest of PRA, condition confirmation of Debtor’s plan consistent with this objection.

/s/ Dan Childers

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of this document was served electronically on parties who receive electronic notice through CM/ECF as listed on CM/ECF’s notice of electronic filing or mailed USPS on May 6, 2024.

By: /s/ Patti K. O’Keefe